## IN HE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

UNTITED STATES OF AMERICA :

Docket Number

V.

10-cr-00510-JBS

SEAN SOULS,

Defendant. :

## **ORDER**

Now this \_\_day of August 2012, it is hereby ORDERED that defendant's motion to modify his conditions of pretrial release permitting to travel within the continental United States with prior approval of the Pretrial Supervision Officer be hereby GRANTED.

IN HE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

UNTITED STATES OF AMERICA :

Docket Number

V.

10-cr-00510-JBS

SEAN SOULS,

Defendant. :

DEFENDANT'S MOTION FOR THE COURT TO MODIFY CONDITIONS OF PRETRIAL RELASE

Now comes Defendant and moves this Honorable Court to modify the conditions of pretrial release, specifically, that he be permitted to travel for work related purposes within the continental United States and in support thereof states the following:

Defendant is currently under the Supervision of the United States Pretrial Services office pending federal; charges.

Defendant currently works as a travelling preacher. This is Defendant's only means of support. His preaching work requires that he travel outside the Eastern District of Pennsylvania and the District of New Jersey several times each month. If Defendant cannot travel outside the above mentioned districts his ability to provide for himself and his family will be severely affected.

Both Pretrial Services Offices involved, New Jersey and Pennsylvania, are aware of this motion and they do not object.

WHEREFPORE, Defendant respectfully, requests that this Honorable Court grant this motion and permit Defendant to travel for work related reasons within the continental United States once prior approval is obtained from the Supervising Pretrial Services Officer.

Respectfully,
/s/Jose Luis Ongay
Iose Luis Ongay, Esquire

Date: August 6, 2012

## **CERTIFICATE OF SERVICE**

I certify that on this date a copy of this motion was served upon AUSA Mathew Smith via the ECF filing system.

/s/Jose Luis Ongay
Jose Luis Ongay, Esquire

Date: August 6, 2012